

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA**

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IN RE: CHAD D. HOVE, DEBTOR  
CHAPTER 11 BANKRUPTCY CASE NO. 24-30202  
JOINTLY ADMINISTERED

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IN RE: PRECISIONOMICS, LLC, DEBTOR  
CHAPTER 11 BANKRUPTCY CASE NO. 24-30203  
JOINTLY ADMINISTERED

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**MOTION TO EXPEDITE RELIEF PURSUANT TO FED. R. BANKR. P. 9006(c)  
RE: MOTION FOR SUBSTITUTION OF COUNSEL**

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1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding as defined by 28 U.S.C. § 157.
2. Debtors consented to the substitution of Sara E. Diaz as Debtor's counsel by Maurice B. VerStandig of The Dakota Bankruptcy Firm,
3. The substitution of Debtor's counsel is necessary as Ms. Diaz is scheduled to start a new position as the Clerk of the North Dakota Bankruptcy Court on November 17, 2025.
4. Local Rule 9010-2(C) requires a 14-day notice to interested parties prior to withdrawal or substitution of counsel. Given the timing, the notice period would expire on November 17, 2025, which does not allow sufficient time for the Court to enter an order prior to Ms. Diaz's transition to her new role.
5. Undersigned counsel requests the Court set this matter for hearing as soon as possible.
6. Any hearing to be set by the Court will be heard at Quentin N. Burdick U.S. Courthouse, 655 1<sup>st</sup> Ave. N. Courtroom #3, Fargo, ND 58102.
7. Because this Motion is brought on an expedited basis, the Debtors request the Court to shorten the notice period and require any response to the Motion be filed and served at least 24 hours prior to the hearing.

UNLESS A RESPONSE IS TIMELY SERVED AND FILED, THE COURT MAY  
GRANT THE MOTION WITHOUT A HEARING.

Dated: November 10, 2025

BULIE DIAZ LAW OFFICE

BY: /s/ SARA E. DIAZ  
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